

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA ET AL.
ex rel. RAYBURN ALEX THOMPSON,

Plaintiffs

v.

Civil Action No. 3:20-cv-2917-D

APOLLO PATH, LLC D/B/A APOLLO
LABORATORIES; APOLLO
LABORATORIES SERVICES, LLC; ARBOR
DIAGNOSTICS, INC.; DOUBLE HELIX
MANAGEMENT, LLC; KORENVAES
MANAGEMENT, LLC; DAVID KEY;
BRIAN OLIVER; and MAX KORENVAES

Defendants.

**RELATOR’S MOTION TO EXTEND
DEADLINE TO FILE SECOND AMENDED COMPLAINT
BY ONE ADDITIONAL WEEK**

Plaintiff-Relator Rayburn “Alex” Thompson III (“Relator”) moves to extend the deadline to file Relator’s Second Amended Complaint (“SAC”) by seven (7) days, from April 2, 2025 to April 9, 2025. As grounds for this motion, the Relator states the following:

1. On October 21, 2024, Relator filed the First Amended Complaint (“FAC”). ECF 52.
2. On November 4, 2024, the Defendants filed a motion to dismiss the FAC. ECF 54.
3. On March 5, 2025, this Court granted the Defendants’ motion to dismiss the FAC and granted Relator leave to file a SAC within 28 days of the Court’s Order. ECF 77.

4. The Relator requests an additional week of time to assess whether he will file a Second Amended Complaint or not.

5. Relator has good cause for this extension, which is not sought for any improper purpose or delay. Relator has been in discussions with Defendants for weeks and was hopeful that they would reach an agreement. Additional time is necessary to continue efforts to try to reach an agreement and determine whether or not to amend. No party will be prejudiced by allowance of this Motion.

WHEREFORE, for the reasons set forth above, the Parties respectfully request that the deadline for Relator to file an SAC be extended by seven (7) days, from April 2, 2025, to April 9, 2025.

Date: April 2, 2025

Relator Rayburn “Alex” Thompson III,

By his attorneys,

/s/ Christopher R. O’Hara

Christopher R. O’Hara (BBO #548611)

Admitted Pro Hac Vice

Seth J. Robbins (BBO#655146)

Admitted Pro Hac Vice

Evan A. Johnson (BBO #699582)

Admitted Pro Hac Vice

Todd & Weld LLP

One Federal Street

Boston, MA 02110

(617) 720-2626

cohara@toddweld.com

srobbins@toddweld.com

ejohnson@toddweld.com

Jeffrey A. Newman, Esq.

Massachusetts BBO # 370450

Jeffrey Newman Law

One Story Terrace

Marblehead, Ma. 01945

Tel: (617) 823-3217

Jeff@JeffNewmanLaw.com

Admitted Pro Hac Vice

Cory S. Fein

Texas Bar No. 06879450

CORY FEIN LAW FIRM

13105 Northwest Fwy #705

Houston, TX 77040

(713) 730-5001

cory@coryfeinlaw.com

CERTIFICATE OF SERVICE

I, Cory Fein, hereby certify that on April 2, 2025 I filed the above document through the ECF system which will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Cory Fein
Cory Fein

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)

I, Christopher R. O'Hara, hereby certify that the parties conferred regarding the above motion, as required by Local Rule 7.1(a)(2).

/s/ Christopher R. O'Hara
Christopher R. O'Hara